



DATE: April 27, 1983

TO: Land Division File

FROM: Rick Hersemann, ^{RAH}DLPC/FOS-Central Region

SUBJECT: LPC #04180802 - DOUGLAS COUNTY - TUSCOLA/U.S. INDUSTRIAL CHEMICALS



On April 27, 1983, a meeting was held at the Springfield Regional Office between representatives of USI and I.E.P.A. Topics of discussion included: Amending USI's Part A application, the October 26, 1982 Subpart F groundwater inspection, waiving the groundwater monitoring requirements for USI's hazardous waste surface impoundment, and delisting the surface impoundment from being a hazardous waste surface impoundment.

USI would like to amend their Part A application. Items to be delisted or changed on the amended Part A are asbestos, spent halogenated solvents, vanadium pentoxide, and chromium wastes. USI does not feel that their hazardous waste surface impoundment (Snake River) meets the definition of a hazardous waste surface impoundment. USI feels that Snake River is a wide spot in the line. USI will submit a proposal in the Part A amendment concerning the delisting of Snake River as a hazardous waste surface impoundment. If the delisting of Snake River is not granted, USI will go for a waiver of the groundwater monitoring requirements under 725.190(E).

Concerning the Subpart F inspection of October 26, 1982, USI has installed three monitor wells closer to the Snake River surface impoundment. USI will also analyze the waste streams entering Snake River for characteristics of hazardous wastes. USI feels that geologic cross-sections and maps of the facility (scale 1 inch = 200 feet) are not required in the RCRA regulations.

The above is written to document the meeting of April 27, 1983.

RAH/cp

cc: ~~DLPC~~/FOS, Central Region
M. Haney/Compliance Monitoring